REMARKS / DISCUSSION OF ISSUES

Claims 1-28 are pending in the application.

The Examiner is respectfully requested to state whether the drawings are acceptable.

The Office action rejects claims 6, 7, and 17 under 35 U.S.C. 112, first paragraph. The applicant respectfully traverses this rejection. The Office action states:

> "The claimed "trajectory parameters" and claimed "latency parameter that corresponds to a delay associated with processing the information" is critical or essential to the practice of the invention, but not included in the claim(s) is not enabled by the disclosure. [sic]" (Office action, page 2, paragraph 2.)

The above sentence is incoherent. The Office action cites specific elements that are included in the claims, and then asserts that these elements are not included in the claims.

Because the cited elements are clearly included in the claims, the applicant respectfully requests the Examiner's reconsideration of the rejection of claims 6, 7, and 17 under 35 U.S.C. 112, first paragraph.

The Office action rejects claims 1-5, 8-16, 19-21, and 23-28 under 35 U.S.C. 103(a) over Kawashima et al. (USP 6,079,862, hereinafter Kawashima) and Lazo et al. (USP 6,791,603, hereinafter Lazo). The applicant respectfully traverses this rejection.

Claim 1, upon which claims 2-10 depend, claims a surveillance system comprising an object linker that is configured to link a visual-object detected by a video surveillance system to an RF-object detected by an RF surveillance system.

The Office action asserts that Kawashima's image recognition unit 106A corresponds to an object linker that links a visual-object from a video camera to an Infrared-object from an IR camera system. The applicant respectfully disagrees with this characterization of Kawashima. Kawashima specifically states that "the detection of the object to be tracked based on the video signal from the color camera will be conducted ***only when*** a proposed marker ***is not*** detected by the infrared camera" (Kawashima, column 34, lines 56-59).

In Kawashima, the detection of visual-object based on a video signal is mutually exclusive of the detection of an infrared-object based on an infrared signal, because

Kawashima does not detect a visual-object based on the video signal when an infrared-object is detected, and only detects a visual-object when an infrared-object is not detected. Because Kawashima does not detect both the visual-object and the infrared-object for a given target, Kawashima cannot be said to link the visual-object to the infrared-object.

Lazo teaches the use of an RFID device to track assets. The Office action proposes that Lazo's RFID system can be used in place of Kawashima's IR system. The applicant respectfully notes, however, that replacing Kawashima's IR system with Lazo's RFID system does not overcome Kawashima's specific teaching that video-object tracking is only performed when the detection-object (IR or RFID) is *not* detected.

Because neither Kawashima nor Lazo, individually or collectively, teach or suggest an object linker that links a visual-object to an RF-object, as specifically claimed by the applicant, the applicant respectfully requests the Examiner's reconsideration of the rejection of claims 1-5 and 8-10 under 35 U.S.C. 103(a) over Kawashima and Lazo.

Claim 11, upon which claims 12-18 depend, claims a method of calibrating an RF location determination system in a surveillance area, comprising attaching an RFID tag to a visually identifiable object, determining a first location coordinate of the object based on an appearance of the object in a scene provided by a video camera, determining a second location coordinate of the object based on reception information from an RFID transmitter, and determining one or more adjustment parameters that facilitates a reduction in a difference between the first and second location coordinates of the object.

Assuming in argument that one of ordinary skill in the art would be motivated to replace Kawashima's IR system with Lazo's RFID system, as proposed in the Office action, the applicant respectfully maintains that the proposed combination would not result in the applicant's claimed method of calibrating an RF location determination system.

As noted above, Kawashima does not teach the concurrent detection of both a visually identifiable object and an otherwise identifiable (IR or RFID) object, and specifically teaches the detection of one only when the other is not detected. Thus, Kawashima's system cannot be used to calibrate one of the systems by adjusting for the difference between the locations reported by each of the visual and other (IR or RFID) systems.

Further, neither Kawashima nor Lazo teaches or suggests the calibration of one location-determination system based on the determined location from another location-determination system.

Because neither Kawashima nor Lazo, individually or collectively, teach or suggest determining one or more adjustment parameters that facilitates a reduction in a difference between visually-determined and RF-determined location coordinates of an object, as specifically claimed by the applicant, the applicant respectfully requests the Examiner's reconsideration of the rejection of claims 11-16 under 35 U.S.C. 103(a) over Kawashima and Lazo.

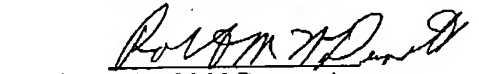
Claim 19, upon which claims 20-28 depend, claims a method of determining a location coordinate of an RF transmitter, comprising determining the location coordinate of an RF transmitter based on reception information from a plurality of receivers, and based on adjustment parameters that are based on one or more differences between first location determinations based on visual images of the target transmitter and second location determination of a target transmitter based on prior reception information from the plurality of receivers.

As noted above, neither Kawashima nor Lazo teaches or suggests determining the coordinates of an RF (or IR) transmitter based on adjustment factors that are determined from visually-determined location coordinates. In Kawashima, the IR detection system is considered the preferred detection technique, independent of the visual system, because visual detection is only used when the IR detection is not operative. In Lazo, the RF system is not used to determine location coordinates.

Because neither Kawashima nor Lazo, individually or collectively, teach or suggest determining the location coordinate of an RF transmitter based on reception information from a plurality of receivers, and based on adjustment parameters that are based on one or more differences between first location determinations based on visual images of the target transmitter, as specifically claimed by the applicant, the applicant respectfully requests the Examiner's reconsideration of the rejection of claims 19-21, and 23-28 under 35 U.S.C. 103(a) over Kawashima and Lazo.

In view of the foregoing, the applicant respectfully requests that the Examiner withdraw the rejections of record, allow all the pending claims, and find the application to be in condition for allowance. If any points remain in issue that may best be resolved through a personal or telephonic interview, the Examiner is respectfully requested to contact the undersigned at the telephone number listed below.

Respectfully submitted,



Robert M. McDermott, Attorney
Registration Number 41,508
patents@lawyer.com

1824 Federal Farm Road
Montross, VA 22520
Phone: 804-493-0707
Fax: 215-243-7525